

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
HAWAIIAN ELECTRIC)
for approval to commit funds in)
excess of \$500,000 for Item Y48500,)
East Oahu Transmission Project.)
_____)

PUC Docket 03-0417

PUBLIC UTILITIES
COMMISSION

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FILED

LIFE OF THE LAND'S

SUPPLEMENTAL INFORMATION REQUESTS TO HAWAIIAN ELECTRIC

&

CERTIFICATE OF SERVICE

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LOL-HECO-SIR-1 re LOL-HECO-IR-7. HECO excluded renewable resources because there is a lack of site, a lack of land, the cost and need for interconnection, etc, etc. In reality, renewables often fit on existing roofs, coexist in multi-use settings, and interconnect to distribution circuits. HECO added that "renewable resource generating plants [are] a non-viable alternative" and thus environmental and economic externalities and the price of oil were not considered since the resource was "non-viable". Since these resources exist in multi-use settings, they must be viable. Including renewables, what was the answer to our original question?

LOL-HECO-SIR-2 re LOL-HECO-IR-9. HECO stated "HECO does not know what the term 'real renewable energy producers' mean. Isn't it obvious that an environmental group would find it an oxymoron to use an Orwellian definition in which there are renewable fossil fuels. That is, some massively polluting, greenhouse gas emitting, 100% fossil fuel units are renewable under Act 95 (2004). Doesn't it make sense that the environmental community needs a new word for renewables since the utility has corrupted the old definition?

LOL-HECO-SIR-3 re LOL-HECO-IR-16-18. HECO stated that the agendas for the Executive Committee meetings were discarded after the meeting was over "on the grounds that attorneys were asked to report at the meetings". Did attorneys helped to chose the preferred alternative? Which attorneys attended the meetings? What other parts of the formulation and design of this proposal were done under the cloak of attorney-client privilege?

LOL-HECO-SIR-4 re LOL-HECO-IR-59. For expert witness Stewart, please list three cases where the witness was hired by a utility and found fault with the way the utility was performing some operation. Please choose cases that would demonstrate that witness Stewart is simple not a hired gun. In the event that the witness never disagreed with a utility in any publicly released document, please state the number of publicly released documents that the witness was in total agreement with utilities that hired him.

LOL-HECO-SIR-5 re LOL-HECO-IR-64. HECO Witness Randall Pollack: "In addition to studying the more probable single contingency outage scenarios, multiple contingencies (outages of more than one system element) must be included in system planning studies, recognizing that while they may have a low probability of occurrence they still can and do happen. (HECO Testimony T-3, page 12, line 23 through page 13, line 1).

Life of the Land asked for clarification of this is our Information Request. LOL asked: (a) Does HECO use probability analysis in transmission planning? (b) How do you determine which outage scenarios are 'more probable'? HECO responded: "the use of the word 'probable' in this context refers to the likelihood of an event in a qualitative sense, rather than in a statistically defined mathematical approach. Thus, the discussion of which outage scenarios might be more or less probable does not require the calculation of a probability of occurrence. The outage (or contingency) scenarios that are more probable, or put another way, those that through industry-wide experience are known to more commonly occur are the 'more probable' outage scenarios."

HECO added in response to LOL-HECO-IR-67: "As compared to the mainland interconnected grid, the Oahu 138kV system is simpler and less complex system. From a planning

perspective, the lower level of complexity of the Oahu system means that is straightforward to identify all of the contingency scenarios to be studied. Since all reasonable outage scenarios are required to be studied to determine compliance with the planning criteria, there is no need to calculate the probability of a particular outage scenario."

When using qualitative rather than rigorous statistical terminology, shouldn't HECO clearly identify that the use of the term is less robust than what the reader might read into the HECO statement? What other terms does HECO use in a qualitative sense rather than in a quantitative sense?

LOL-HECO-SIR-6 re LOL-HECO-IR-68. Is HECO aware of any scientific, peer-reviewed analysis that justifies HECO's statement: "Probability analysis is neither weaker nor stronger than the deterministic method." If deterministic analysis is simpler and largely equivalent, why would anyone conduct rigorous statistical analysis?

Dated November 8, 2004

Henry Q Curtis
Henry Q Curtis

Certificate of Service

I hereby certify that I have this date served a copy of the foregoing Information Requests by Life of the Land, Docket Number 03-417, upon the following parties. The original and 8 copies to the PUC. Two copies to the Consumer Advocate. Three copies to HECO. In addition, electronic copies have been sent to all parties.

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